

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA Liquidation (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff, Plaintiff, v. SNS BANK N.V. and SNS GLOBAL CUSTODY B.V., Defendants.	Adv. Pro. No. 12-01046 (CGM)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Motion to Dismiss the Complaint of Plaintiff Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff (the “Complaint”) [Dkt. 1], dated October 14, 2022, together with the Declaration of George W. Shuster, Jr., dated October 14, 2022, and the exhibits attached thereto, and upon all

prior pleadings and proceedings filed in this case, including the so-ordered Amended Stipulation and Order, dated August 2, 2022 [Dkt. 110], Defendants SNS Bank N.V. and SNS Global Custody B.V. will move this Court for an Order pursuant to Rules 12(b)(2) and/or 12(b)(6) of the Federal Rules of Civil Procedure (“FRCP”) before the Honorable Cecelia G. Morris at the United States Bankruptcy Court for the Southern District of New York on a date and time to be determined by the Court, dismissing the Complaint and for such other and further relief as may be deemed just and proper.

Dated: October 14, 2022
New York, New York

Respectfully Submitted,

WILMER CUTLER PICKERING HALE AND
DORR LLP

By: /s/ George W. Shuster, Jr.

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